

**ATTACHMENT A**  
**Statement of Facts – Devontae West**

*The parties hereby stipulate and agree that if this case proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt. They agree that these are not all of the facts that would be proved if this case proceeded to trial.*

Between on or about May 12, 2013, and on or about May 22, 2013, in the District of Maryland and elsewhere, defendants **DEVONTAE WEST (“WEST”)**, Keith McBride (“McBride”) Stephanie Fletcher (“Fletcher”), and others, did knowingly agree and conspire with other persons to commit bank robberies, to take and attempt to take by force and by intimidation, property from the presence of another in the care, custody, control, management and possession of federally insured banks, in violation of 18 U.S.C. §§ 371 and 2113(a).

During the conspiracy, **WEST** and his co-conspirators committed various acts in furtherance of the conspiracy, including stealing vehicles to drive to and away from the bank robberies; designating a co-conspirator to act as a getaway driver from the bank robberies; writing demand notes to present to bank tellers; using juveniles to enter the banks to demand money; using cellular telephones to maintain constant contact before, during and after the bank robberies; and dividing the proceeds of the bank robberies amongst their co-conspirators. As part of the conspiracy, **WEST** participated in the following bank robberies and attempted bank robbery:

1. On March 20, 2013, **WEST**, Stephon Fortune (“Fortune”), Brittany Daniels (“Daniels”), and a juvenile drove to the Suntrust Bank branch on 8924 Woodyard Rd., Clifton, Maryland in **WEST**’s car and a stolen vehicle. Fortune entered the bank with a note demanding money and approached a teller. The teller gave \$1,710 in United States currency to Fortune.

2. On March 25, 2013, **WEST**, Fortune, Calvin Manning (“Manning”), Daniels, and a juvenile drove to the Suntrust Bank branch on 3550 Donnell Dr., District Heights, Maryland in Daniels’ vehicle. Manning and the juvenile entered the bank with notes demanding money and approached teller. The teller gave \$2,169 in United States currency to ~~Fortune~~ and the juvenile.

3. On May 6, 2013, **WEST**, Fortune and two juveniles drove to the Capitol One Bank branch on 6206 Annapolis Rd., Landover Hills, Maryland in a stolen vehicle. The two juveniles entered the bank with notes demanding money. The teller gave \$6,875.25 in United States currency to the two juveniles.

4. On May 13, 2013, **WEST**, Fletcher, McBride and one juvenile female drove to the Capitol One Bank branch at 3601 St. Barnabas Rd., Suitland, Maryland. Fletcher and the juvenile female entered the bank with notes that demanded money and approached tellers. Fletcher and the juvenile then exited the bank and left with defendants **WEST** and McBride, without having obtained any money.

5. On May 13, 2013, **WEST**, Fletcher, McBride and one juvenile female drove to the TD Bank branch at 905 Rhode Island Avenue, NE, Washington, D.C. Fletcher and the



juvenile entered the bank, and handed a note to a bank teller that demanded money. The teller gave \$2,505 in United States currency to Fletcher and the juvenile.

6. On May 22, 2013, **WEST**, Fletcher, Garrett and McBride drove to the SunTrust Bank branch in 3550 Donnell Drive, Forestville, Maryland in West's car and a stolen vehicle. McBride entered the SunTrust Bank branch at 3550 Donnell Drive, Forestville, Maryland with a note that demanded money and handed it to a bank teller. The teller gave \$1,339 in United States currency to McBride.

SunTrust Bank, including the branches above, was a financial institution whose accounts were federally insured by the Federal Deposit Insurance Corporation.

On May 5, 2013, **WEST** engaged in vaginal and oral sex with J.P., a 15 year old female he used to assist him with the bank robbery on May 6, 2013, one attempted and one completed bank robbery on May 13, 2013, and a bank robbery on May 21, 2013. **WEST** took eight (8) photographs using his Kyocera cellular telephone which depict J.P. engaging in oral sex with the defendant. These photographs were on **WEST**'s Kyocera cellular telephone when he was arrested. The Kyocera cellular telephone was not manufactured in the state of Maryland and, therefore, traveled in interstate or foreign commerce.

I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

3/12/14  
Date

Devontae West  
Devontae West

I am Devontae West's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

3/10/14  
Date

John M. McKenna  
John M. McKenna, Esq.

3/12/14  
Date

Michael W. McBraw  
Michael W. McBraw, Esq.  
Admitted to practice in this Court